

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

TITLE V DRAFT PERMIT NO. V-04-020
STONEHOUSE BUILDING PRODUCTS L. L. C.
8025 BLUEGRASS DRIVE FLORENCE, KENTUCKY, 41042
JUNE 2, 2004
FROUGH SHERWANI, REVIEWER
PLANT I.D. # 021-015-00144
APPLICATION LOG # 56382

SOURCE PROCESS DESCRIPTION:

Stone house uses processes and materials that are typical for the reinforced plastic composite (RPC) industries. The primary production emissions units at the proposed new Stone house facility include: (a) spray applications of gel coat; and (b) polymer casting operations with resins and filler. Other activities with small amounts of air emissions include fabrication, mold making, clean-up operations (acetone), and natural gas combustion for heating

Emission Points 01 (S01) through 12(S12)

**Open Molding (Gel Coat Spray –Up)
Operation # 01 through Operation # 12**

Emission Points 13 (S13) and 14 (S14)

**Resin/Filler Polymer Casting Operation # 01
Resin/Filler Polymer Casting Operation # 02**

COMMENTS:

Type of control and efficiency:

Emission points 01 through 12 have filters to control particulate matter.

Emission factors and their source:

VOC and HAPS emission factors were derived from table 1 of the 40 CFR Part 63 Subpart WWWW. The particulate matter emission factor was derived from the assumption of 5% over spray in gel coat spray operations. The polymer resin casting emission factor was derived from AP-42.

Applicable regulation:

1. **401 KAR 59:010**, New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975)
2. **40 CFR Part 63, Subpart WWWW, NESHAPS: Reinforced Plastic Composites Production**

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 95 tons per rolling 12-month period to preclude 401 KAR 50:012. Compliance with emissions cap will be demonstrated with record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual HAPS emissions of no more than 95 tons per rolling 12-month period. This limitation, per 40 CFR 63.5805 (c), will allow the facility to use low-HAP content materials to meet specific emissions limitations listed in table 3 of this rule. In addition, the facility will also have to comply with work practice standards listed in table 4.

PERIODIC MONITORING:

This permit requires monthly records of material usage and emissions to demonstrate compliance with the 12 months emissions limitations.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.